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[Additional counsel appear on signature page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**DECLARATION OF MATTHEW S.
WEILER IN SUPPORT OF PLAINTIFFS'
MOTION TO SEAL PROVISIONS OF
THEIR REPLY BRIEF IN SUPPORT OF
THEIR MOTION TO CHALLENGE
ZUFFA'S PRIVILEGE DESIGNATION**

1 I, Matthew S. Weiler, declare and state as follows:

2 1. I am an attorney at the Joseph Saveri Law Firm, Inc. ("JSLF"), Co-Lead Counsel for
3 the Classes and Attorneys for Individual and Representative Plaintiffs Cung Le, Nathan Quarry, Jon
4 Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury in the above-captioned matter. I am a
5 member in good standing of the State Bar of California, and have been admitted to this Court *pro hac*
6 *vice*. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If
7 called as a witness, I could and would testify competently to them.

8 2. I make this declaration in support of Plaintiffs' reply in support of their motion to
9 challenge Defendant's designation of attorney-client privilege with respect to one certain email
10 communication, which was filed with the Court on April 1, 2016. Dkt. 229.

11 3. Attached hereto is a redacted version of Plaintiffs' reply in support their motion to
12 challenge Defendant's assertion of attorney-client privilege over one certain document. This reply
13 brief has been redacted to obscure references to two documents that Zuffa has designated
14 "confidential" under the terms of the Protective Order. Plaintiffs take no position on the issue of
15 whether it is appropriate to seal these references under governing legal standards.

16 4. This reply brief also has redactions related to references to the declaration of
17 Thomas Paschall. Zuffa claims that Mr. Paschall's declaration reflects "confidential
18 communications from its outside counsel providing legal advice to the company based that outside
19 counsel's understanding of confidential business and financial information provided by Zuffa to its
20 outside counsel for the purposes of receiving legal advice." Dkt. 232 at 2. Plaintiffs take no position
21 concerning whether Mr. Paschall's statements in his declaration constitute legal advice, or should be
22 sealed under governing legal standards. As set forth in their papers supporting their motion to
23 challenge, Mr. Paschall's statements concerning Zuffa's purposes in purchasing Pride FC are not
24 protected by attorney-client privilege.

